UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

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)) Case No. 1:25-cv-21570
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MOTION TO APPEAR *PRO HAC VICE*, CONSENT TO DESIGNATION, AND REQUEST TO ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING

In accordance with Local Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Mara Theophila of the law firm of McDermott Will & Emery LLP, for purposes of appearance as co-counsel on behalf of Defendants Dr. Ameet Vohra, Vohra Wound Physicians Management, LLC, and VHS Holdings, P.A. in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Mara Theophila to receive electronic filings in this case, and in support thereof states as follows:

1. Mara Theophila is not admitted to practice in the Southern District of Florida and is a member in good standing of the Bars of the State of New York and Commonwealth of Massachusetts, the U.S. District Court for the Eastern and Southern Districts of New York, the U.S. District Court for the District of Massachusetts, and the U.S. Court of Appeals for the First Circuit.

- 2. Movant, Leah Palmer, Esq., of the law firm of McDermott Will & Emery LLP, 333 SE 2nd Avenue, Suite 4500, Miami, Florida 33131, is a member in good standing of the Florida Bar and the U.S. District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.
- 3. In accordance with the local rules of this Court, Mara Theophila has made payment of this Court's \$250.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.
- 4. Mara Theophila, by and through designated counsel and pursuant to Section 2B of the CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Mara Theophila at mtheophila@mwe.com.

WHEREFORE, Leah Palmer, moves this Court to enter an Order for Mara Theophila to appear before this Court on behalf of Defendants for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Mara Theophila.

Date: May 7, 2025 Respectfully submitted,

> By: /s/ Leah Palmer

Leah Palmer (FBN 1050765)

lpalmer@mwe.com 333 SE 2nd Avenue Suite 4500

Miami, Florida 33131-4336

Tel: 305-358-3500 Fax: 305-347-6500

Counsel for Defendants Dr. Ameet Vohra, Vohra Wound Physicians Management, LLC, and VHS Holdings, P.A.